

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking into Policies to
Promote a Partnership Framework between
Energy Investor Owned Utilities and the
Water Sector to Promote Water-Energy
Nexus Programs

Rulemaking 13-12-011
(Filed December 19, 2013)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)
TO ASSIGNED COMMISSIONER'S RULING ENTERING WORKSHOP REPORTS
INTO THE RECORD AND SEEKING COMMENTS
DATED OCTOBER 5, 2016**

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Dated: October 31, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking into Policies to
Promote a Partnership Framework between Energy
Investor Owned Utilities and the Water Sector to
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Application 13-12-011
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On October 5, 2016, Commissioner Sandoval issued a Ruling, *Ruling of Assigned Commissioner Entering Workshop Reports into the Record and Seeking Comments* (“Ruling”), to solicit comments on workshop reports, meta-themes and questions, relating to the six workshops held in the Water-Energy Telecommunications Nexus portion of the above-captioned proceeding. San Diego Gas & Electric Company (“SDG&E”) hereby submits its reply comments in response to comments submitted by parties to the Ruling.¹

I. Data Collection and Data Sharing

SDG&E shares several parties concerns regarding data privacy with increased discussions to explore developing data sharing between energy utilities and water agencies. In particular, SDG&E supports CWA’s request to adopt rules to safeguard water customer data, including privacy protections and security.² Furthermore, SDG&E concurs with PG&E and

¹ Comments were submitted by the following parties: AT&T California, Association of California Water Agencies and California Municipal Utilities Association (“ACWA- CMU”), California Water Association (“CWA”), Green Power Institute (“GPI”), Metropolitan Water District (“MWD”), Pacific Gas & electric Company (“PG&E”), Southern California Gas Company (“SoCalGas”).

² CWA, pp. 3-4.

SoCalGas that these data sharing rules should be consistent with the energy data rules that have been addressed in D.11-07-056, D.12-08-045, D.13-09-025, and D.14-05-016.³

II. Increased Collaboration Between Water, Energy and Telecommunications Utilities

Similar to the other energy utilities,⁴ SDG&E and the San Diego County Water Authority together with its member agencies with their the long history of partnerships and collaboration, continue to explore opportunities that would promote cost effective water energy nexus (“WEN”) measures and programs with the goal towards achieving energy and water savings. The Commission’s adoption of the WEN cost effectiveness calculator provides the opportunity to objectively make decisions regarding the implementation of WEN projects.

With respect to energy communications component, SDG&E concurs with PG&E.⁵ To the extent they pertain to distributed energy resources (“DER”) connecting to the electric utility’s distribution grid to provide services to help meet the needs and goals of the electric utility, end-use customers, and the state, SDG&E believes that scoping issues included in R.14-08-013, the Distribution Resources Plan (“DRP”) proceeding, and as discussed in R.14-08-013 and action items required in D16.06-052 already include pursuing developing guidance and policies pertaining to communications technologies required to safely and reliably interconnect to the electrical distribution grid. Specifically:

- The recent (October 21) ruling in the R.14-08-013 Track 3 includes a scoped Sub-track 2: Grid Modernization Investment Guidance, which is focused, in part, on identifying the types and functions of technologies, including those related to communications that will enable greater DER penetration on the electrical distribution grid.

³ PG&E, p. 2-3; and SoCalGas, pp. 2-3, 10.

⁴ PG&E, p. 6; SoCalGas, pp.3-5;MWD, p. 3.

⁵ PG&E, p.5.

- D.16-06-052 Ordering Paragraph 9 states, “Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall file proposed revisions to Tariff Rule 21 setting forth any agreed-upon technical requirements, testing and certification processes, and effective dates for Phase 2 communication protocols and Phase 3 additional advanced inverter functions in separate Tier 3 advice letters no later than six months from the effective date of this decision.”

Therefore it is not necessary to duplicate these efforts in this proceeding.

SDG&E appreciates the opportunity to provide these reply comments and looks forward to continuing the promotion of programs and projects to achieve WEN energy and water savings.

Respectfully submitted,

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